

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Leonard F. Joy
Executive Director

Southern District of New York
John J. Byrnes
Attorney-in-Charge

May 14, 2008

BY HAND

Alvin K. Hellerstein

United States District Judge

For the Southern District Of New York

500 Pearl Street

New York, New York

Re: United States v. Melvin Heard
Crim. Dkt. 08 Cr. 232 (AKH)

*HCA Time extended, do
Conf adj until
May 28, 2008
@ 11:30 a.m.
Admitted 5/19/08*

The Hon. Judge Hellerstein

I am writing to request for an adjournment of the May 19, 2008, status conference on the above matter. The parties are very close to working out a disposition on this case and just today I have received a plea offer from the government.

I need an additional two weeks to discuss the offer with my client, and ask the court to adjourn the status conference to a date at the end of May or early June. I anticipate that my client will be ready to enter a guilty plea at that time. AUSA Masters has no objection to this request.

To that end, we request that the time between April 19, 2008 and the next date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(8)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the government and defense counsel to continue discussions regarding a possible disposition in the matter. Thank you.

Respectfully submitted,

Shroff
Sabrina P. Shroff

cc: AUSA Masters

